

Fill in this information to identify the case:Debtor 1 JOEL LEE REECEDebtor 2 CAROLYN SUE REECE
(Spouse, if filing)United States Bankruptcy Court for the: Middle District of PennsylvaniaCase number 1:20-bk-02293-HWV

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage InformationName of Creditor: Freedom Mortgage CorporationCourt claim no. (if known):
9Last 4 digits of any number you use to identify the debtor's account: 0042Property address: 623 Mohawk Road
Number Street
Newville, PA 17241
City State ZIP Code**Part 2: Prepetition Default Payments**

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is:

\$ _____

Part 3: Postpetition Mortgage Payment

Check one:

- ☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 08/01/2025
MM/DD/YYYY

- ☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due: (a) \$ _____
- b. Total fees, charges, expenses, escrow, and costs outstanding: +(b) \$ _____
- c. **Total.** Add lines a and b. (c) \$ _____

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

MM/DD/YYYY

Debtor1 JOEL LEE REECE
First Middle Last

Case number (if known) 1:20-bk-02293-HWV

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- ☐ I am the creditor.
☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

x/s/Mario Hanyon Date 07/31/2025
Signature

Print Mario Hanyon Title Attorney
First Name Middle Name Last Name

Company Brock & Scott, PLLC

If different from the notice address listed on the proof of claim to which this response applies:

Address 3825 Forrestgate Dr.
Number Street
Winston-Salem, NC 27103
City State ZIP Code

Contact phone 844-856-6646 Email PABKR@brockandscott.com

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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**
Harrisburg Division

IN RE:

JOEL LEE REECE AND CAROLYN SUE REECE

Case No. 1:20-bk-02293-HWV

Chapter 13

Freedom Mortgage Corporation,

Movant

vs.

JOEL LEE REECE AND CAROLYN SUE
REECE,

Debtors

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the foregoing Response to Notice of Final Cure Payment has been electronically served or mailed, postage prepaid on this day to the following:

Via Electronic Notice:

Kara Katherine Gendron, Debtor's Attorney
125 State Street
Harrisburg, PA 17101
karagendron@gmail.com

Jack N Zaharopoulos, Bankruptcy Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

United States Trustee, US Trustee
US Courthouse
1501 N. 6th St
Harrisburg, PA 17102

Via First Class Mail:

Joel Lee Reece
623 Mohawk Rd
Newville, PA 17241

Carolyn Sue Reece
623 Mohawk Rd
Newville, PA 17241

Date: July 31, 2025

/s/Mario Hanyon

Andrew Spivack, PA Bar No. 84439

Mario Hanyon, PA Bar No. 203993

Ryan Srnik, PA Bar No. 334854

Jay Jones, PA Bar No. 86657

Attorney for Creditor

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